G. MARK ALBRIGHT, ESQ. (#001394)
JORGE L. ALVAREZ, ESQ. (#014466)
ALBRIGHT, STODDARD, WARNICK & ALBRIGHT

801 South Rancho Drive, Suite D-4
Las Vegas, Nevada 89106
T: (702) 384-7111 / F: (702) 384-0605
gma@albrightstoddard.com
jalvarez@albrightstoddard.com
Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

SOCORRO CHAVEZ, INDIVIDUALLY, and JUAN CHAVEZ, INDIVIDUALLY

Plaintiffs,

V.

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

WYNDHAM VACATION RESORTS, INC., TOM S. PALMER, AN INDIVIDUAL, and DOE INDIVIDUALS I through X, inclusive; and ROE BUSINESS ENTITIES XI through XX, inclusive,

Defendants.

CASE NO.: 2:20-cv-01222-JCM-DJA

ERRATA TO UNOPPOSED MOTION
TO EXTEND DISCOVERY
DEADLINES AND AMEND
DISCOVERY PLAN AND
SCHEDULING ORDER [ECF NO. 30]

[FIRST EXTENSION]

Plaintiffs SOCORRO CHAVEZ and JUAN CHAVEZ (hereinafter "Plaintiffs"), by and through their respective counsel of record, hereby file this Errata to the Unopposed Motion to Extend Discovery Deadlines and Amend Discovery Plan and Scheduling Order, to correct certain proposed discovery dates therein as follows:

SCHEDULING ORDER

Plaintiffs propose, and Defendants have consented, that the Joint Discovery Plan and Scheduling Order [ECF No. 30] shall be amended as follows, with all other stipulations therein remaining unchanged:

a. Discovery Cut-Off Date: June 24, 2021 (formerly March 26, 2021)

2728

G:\Timeshare Litigations\Chavez v. Wyndham (11292.0030)\Federal Case\Pleadings\2020-12-31-Errata to Unopposed Mtn to Extend Discovery.docx

- b. Amending the Pleadings and Adding Parties: March 26, 2021 (formerly December 24, 2020)
- c. Initial Expert Disclosure: **April 26, 2021** (formerly January 25, 2021)
- d. Rebuttal Expert Disclosure: May 25, 2021 (formerly February 24, 2021)
- e. Dispositive Motions: July 26, 2021 (formerly April 26, 2021).
- f. Pretrial Order: **August 25 2021** (formerly May 26, 2021), unless pursuant to LR 26-1(e)(5), if dispositive motions are filed, this date will be suspended until 30 days after decision on the dispositive motions or further order of the Court.

Therefore, Plaintiffs, with the consent of Defendants, respectfully request that the Court enter an order approving the proposed discovery schedule as set forth above.

DATED this <u>31st</u> day of December, 2020.

ALBRIGHT, STODDARD, WARNICK & ALBRIGHT

/s/ Jorge L. Alvarez, Esq.
G. MARK ALBRIGHT, ESQ., #1394
JORGE L. ALVAREZ, ESQ., #14466
801 South Rancho Drive, Suite D4
Las Vegas, Nevada 89106
T: 702.384.7111 / F: 702.384.0605
Attorneys for Plaintiffs

ORDER

IT IS HEREBY ORDERED that the current Discovery Plan and Scheduling Order be amended as follows:

- a. Discovery Cut-Off Date: **June 24, 2021** (formerly March 26, 2021)
- b. Amending the Pleadings and Adding Parties: March 26, 2021 (formerly December 24, 2020)
- c. Initial Expert Disclosure: **April 26, 2021** (formerly January 25, 2021)
- d. Rebuttal Expert Disclosure: **May 25, 2021** (formerly February 24, 2021)
- e. Dispositive Motions: **July 26, 2021** (formerly April 26, 2021).

Case 2:20-cv-01222-JCM-DJA Document 39 Filed 02/35/20 Page 3 of 3

LAW OFFICES
ALBRIGHT, STODDARD, WARNICK & ALBRIGHT
A PROFESSIONAL CORPORATION
QUAIL PARK SUITE D-4
801 SOUTH RANCHO DRIVE
LAS VEGAS, NEVADA 89106

f. Pretrial Order: **August 25, 2021** (formerly May 26, 2021), unless pursuant to LR 26-1(e)(5), if dispositive motions are filed, this date will be suspended until 30 days after decision on the dispositive motions or further order of the Court.

IT IS FURTHER ORDERED that requests to extend any dates set forth by this Discovery Plan and Scheduling Order shall, in addition to satisfying the requirements of LR 6-1, be supported by a showing of good cause for the extension. All motions and stipulations shall be received no later than 20 days before the discovery cut-off date, or no later than May 14, 2021, and shall fully comply with the requirements of LR 26-4. The Court reserves the right to conduct a status check conference for any requests to extend the discovery.

IT IS SO ORDERED.

UNITED STATES MAGISTRATE JUDGE

DATE: _______